

ANGELO L. CLARK  
V.

6/9/08

CASE NO. 1:06-465-S.L.R.

(MOTION FOR)

AFFIDAVIT BRIEF IN!

SUPPORT OF SUMMARY

JUDGEMENT (D.I. 72)

AFFIDAVIT

REGIONAL MEDICAL FIRST  
CORRECTIONAL ET-AL  
AND  
CORRECTIONAL MEDICAL  
SERVICES

Signature

(Angelo L. Clark)

FILED

JUN 13 2008

U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

Affidavit - Brief for Summary Judgement

CLERK OF COURT: Judge SUE L. ROBINSON

1. STATEMENT OF FACTS: ENCLOSED YOU WILL FIND EXHIBITS AND DOCUMENTS IN WHICH VIOLATED MY EIGHTH AMENDMENT RIGHTS, CIVIL RIGHTS AND MY MALPRACTICE ISSUES. UNDER 42 U.S.C. § 1983 COMPLAINT OF INADEQUATE MEDICAL TREATMENT, DELIBERATE INDIFFERENCE TO MY SERIOUS MEDICAL NEEDS, ESTELLE V. GAMBLE, 429 U.S. 97, 104-06 (1976). AS YOU ARE AWARE JUDGE SUE L. ROBINSON: THEY THE MED VENDORS FOR DEPT OF CORRECTIONS THEY DIDN'T ONLY VIOLATE MY 8TH AMENDMENT DUE PROCESS AS A HAMAM BEING THEY TORTURED, MY MY BODY AND SOUL WITH ZYPREXA, TRASSADONE, TRILLADON AND E.T.C. TO MAKE ME NOT ONLY TURN INTO A MAD DOG WITH NO BRAIN, BUT THEY THE MED VENDORS AND DEPT OF CORRECTIONS MADE MY BRAIN BLEED FROM TIME TO TIME, AND I HAVE VERY TERRIBLE HEAD TRAUMA ON A EVERYDAY BASIS. AND E.T.C. AND MY POOR BODY IS ALL BROKEN UP, AND NOW I CAN'T HOLD MY WATER I'M ON DIAPERSE EVERY DAY, ITS LIKE MY WHOLE SYSTEM IS SHUTTING DOWN.

3. HONORABLE Judge Sue L. Robinson:

it is like I'm in The CARTEL Building, its like I'm 80 yrs old AND CAN'T TAKE CARE OF MYSELF, I FEEL AS THOUGH ME AS A PERSON THE WHOLE TIME I WAS INCARCERATED SINCE, 2004 MY WHOLE CHARACTER HAS BEEN TOTALLY VIOLATED, AND AT THIS PRESENT TIME AND AGE IN MY LIFE, I'M ASKING YOU FOR A NICE COMPENSATION PACKAGE AND MONETARY, POSITIVE WAGES FOR MOST IF NOT ALL OF MY INJUSTICES!

4. AND Judge Sue L. Robinson:

I HOPE AND PRAY THAT YOU AS THE GODLY INFLUENCED PERSON THAT YOU HAVE BECOME TO BE, THAT MY SUMMARY JUDGEMENT-BRIEF AND AFFIDAVITS OF (D.I.T.) WHEN IS YOUR APPROVAL OF A FAVORITABLE JUDGEMENT FOR ME, AND IN ACCEPTANCE THAT YOU ARE A VERY GOOD AND UNDERSTANDING JUDGE OF JUDGEMENTSHIP!

INCLOSED IS DOCUMENTS  
AND EXHIBITS!

Thanks For  
Every Thing!

AND I WOULD LIKE  
TO GO TO TRIAL IF NES-  
SASARY!  
MAY GOD BLESS!

And Giving me another Chance!

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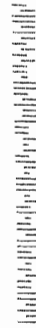


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19801-3570*

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U.S.M.S.  
X-RAY



*Legal Mail*



**Exhibit**

be any evidence in the medical records of torture and it appears more likely that the plaintiff was suffering from delusions brought on by his illness or manufacturing symptoms for secondary gain. However, even if the Plaintiff were given substantial leeway in his failure to meet his burden of persuasion that he will likely succeed on the merits, the Plaintiff cannot produce any evidence that irreparable harm will result if an Injunction is not granted.

B. There is no evidence that denial of an Injunction will result in Irreparable Harm to the Plaintiff.

As the medical records and Affidavit of Dr. Cannuli demonstrate, the Plaintiff continues to be monitored, evaluated, and treated for various diagnoses, including

schizophrenia and bi-polar disorder. As of July 19, 2007, the Plaintiff has agreed to be

compliant with his medication and it is expected that while he remains compliant, that his

behavioral functionality will improve.

Attached as exhibit K are the Plaintiff's Medication Administration Records from

June 2006 to July 19, 2007 that indicate the Plaintiff was prescribed medications which

include, HCTZ, MVI, Nitroglycerin Patch, Plendil, Colace, Lopid, Ditropan, Seroquel,

Lithium, Ativan, Inderal, Prolosec and Ointment for dry skin. On July 19, 2007, Dr.

Cannuli examined the Plaintiff and observed that the Plaintiff appeared to be

decompensating and that the Plaintiff admitted to not always taking his medication

because it made him feel funny. See July 19, 2007 Psychiatric Progress Note attached as

exhibit J. The Plaintiff has since confirmed with Dr. Cannuli that he will be compliant

with taking his medication. See affidavit of Dr. Cannuli attached as exhibit B.

The Plaintiff's recent court filings of July 20, 2007 (DI 65) wherein the Plaintiff

has asked for a lawyer and his July 22, 2007 filing (DI 66) wherein the Plaintiff indicated

